

**IN THE UNITED STATES DISTRICT COURT  
FOR DISTRICT OF NEW JERSEY**

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ED CHAN AND BRENDAN J.  
KAVANAUGH, on behalf of  
themselves and all others similarly  
situated,

PLAINTIFFS,

V.

PORSCHE CARS NORTH AMERICA,  
INC.,

DEFENDANT.

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Civil Action No. 2:15-cv-2106-CCC-  
JBC [consolidated with Civil Action  
No. 2:16-cv-6605-CCC-JBC]

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ROY JONES AND ALYCE  
RUBINFELD, individually and on behalf  
of a class of similarly situated  
individuals,

PLAINTIFFS,

V.

PORSCHE CARS NORTH AMERICA,  
INC., a Delaware corporation and Does  
1-10, inclusive,

DEFENDANTS.

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**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND FOR CERTIFICATION OF THE SETTLEMENT  
CLASS**

For the reasons set forth in the accompanying Memorandum of law submitted herewith, Plaintiffs respectfully request that this Court enter an Order: (1) certifying a class action with respect to the claims against Defendants pursuant to Fed.R.Civ.P. 23 (a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against the Defendant; (2) finally approving the proposed Class Action Settlement; and (3) enter a final order and dismissal in this action.

Dated: July 25, 2017

Respectfully submitted,

By: /s/ Joseph Santoli

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Attorneys for Ed Chan, Brendan J.  
Kavanaugh, Roy Jones, and Alyce  
Rubinfeld and on behalf of the class

Dated: July 25, 2017  
Motion Return Date: October 6, 2017